

IN THE UNITED STATES DISTRICT
COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

Warren Easley
Plaintiff

v

Lt Vogt, et al

do

1:23-CV-1096

Honorable Judge

FILED
SCRANTON

JUN 30 2023

PER

DEPUTY CLERK

Complaint with Jury Demand.

Introduction

This is a civil rights action Filed by Warren Easley
A state Prisoner, For damages and injunctive relief under
42 U.S.C. § 1983, alleging Retaliation, Denial of exercise, Access
to courts in violation of 8th amendment and 1st amendment
to the united states constitution.

Jurisdiction

1. The court has Jurisdiction over the plaintiffs
claims of violation of Federal Constitutional rights
under 42 U.S.C. §§ 1331(1) and 1343.

Parties.

2. The plaintiff, Warren Easley was incarcerated at
~~Scranton~~ S.C.I. Rockview during the events
described in this complaint.
3. Defendant LT. Vogt (Lieutenant) is a LT at S.C.I.
Rockview during the events described in this complaint.
They are sued in their individual and official capacity.

4. miller is a unit manager at S.C.I. Rockview during the events described in this complaint. They are sued in their individual and official capacity.
5. SGT carper is a sergeant at S.C.I. Rockview during the events described in this complaint. They are sued in their individual and official capacity.
6. Richards is a correctional officer at S.C.I. Rockview during the events described in this complaint. They are sued in their individual and official capacity.
7. Micky Paul is the superintendent assistant / Grievance Coordinator at S.C.I. Rockview during the events described in this complaint. They are sued in their individual and official capacity.
8. Solomon is the superintendent ~~complainant~~ at S.C.I. Rockview during the events described in this complaint. They are sued in their individual and official capacity.

Facts

- 9, 6-13-23 Plaintiff took a covid-19 test in order to receive surgery.
- 10, 6-14-23 Plaintiff was told his covid-19 test came back negative
- 11, Plaintiff is pro-se on Easley v. Wetzel No 1:21-cv-0251 in which was sent discovery in suit in may.

Denial of exercise/Denial of access to courts. Retaliation

- 12, 6-12-23 Defendant richards iterated to plaintiff that defendants miller, vogt, carper had a meeting and stated plaintiff will not be allowed to leave his cell at all due to quarantined.
- 13, 6-13-23 Plaintiff spoke to defendant miller regarding Plaintiff going to yard, law library in which defendant miller stated "You are quarantined you get nothing" Plaintiff iterated yard is a right in which defendant miller stated "Grievances is the reason your not coming out now litigator sue me."
- 14, 6-13-23 Plaintiff attempted to speak to Sgt carper regarding plaintiff yard and law library in which Defendant carper stated "Easley you gets nothing. shoulda

thought about that before you started to file grievances on us."

15. 6-14-73 plaintiff attempted to speak to a deputy and major regarding plaintiff's yard in which defendant Vogt overtalked plaintiff stating "Easley always cryn always filing grievances which prevents him from moving along in program or going to yard."

16. 6-15-73 Plaintiff attempted to go to yard in which C.O. Serovee said "SGT emp carper is still saying no"

17. 6-16-73 Plaintiff spoke to consuler mination about yard in which he was told by unit manager miller /LT Vogt Plaintiff will be taken to yard when it can be scheduled."

18. 6-16-73 Plaintiff went out for surgery

19. From 6-18-73 to date plaintiff has been denied yard and access to the law library by defendants carper, miller, vogt and richards.

20. 6-24-73 defendant richards told plaintiff "miller and vogt to carper that you dont go to yard or law library until you go 7 weeks without filing a grievance.

21. 6-27-23 Plaintiff Filed 3 grievances.

22. Plaintiff is suffering due to mental health issues he has dealt with his whole life in which he is currently on medication on.

23. Plaintiff utilizes the exercise to relieve stress and depression. At this point plaintiff has been denied yard for 14 days. Along with the mini law library.

24. Plaintiff cannot litigate pro-se without the law library.

25. Plaintiff is injured mentally, physically and legally due to defendants tactics.

26. 6-23-23 Plaintiff was on the way to speak to a outside doctor in which defendant miller stated "how's no yard been working for you? You play we play"

27. 6-24-23 and 6-25-23 Plaintiff aimed to go to yard in which defendant Richards stated "you have to settle all this grievance bullshit out with Vogt. He said you still dont go to yard its nothing personal"

28. Defendants Nicky Paul and Salaman is well aware plaintiff is Pro-se and has a substantial amount of discovery.

29. Defendants has received plaintiffs discovery in middle of may, over a month ago. Plaintiff has aimed to review discovery countless of times to no avail. Please see exhibit # 1-2-3 and 4.

30. Exhaustion of Remedies.

This is complaint is paired with T.R.o. / Preliminary injunction as Plaintiff suffer irreparable harm. Plaintiff has aimed to exhaust his remedies to the best of his ability.

31. Claims For relief.

A. The actions of all defendants unjustified and a violation of constitution.

B. Request a outside source to investigate defendants actions and retaliation tactics.

C. Request plaintiff provided a mental health evaluation From a Dr. outside the D.C.

D. declare acts, actions, or emissions of each individual unconstitutional.

E. Issue injunctive relief sufficient to rectify the unconstitutional policies, procedures, acts and emissions complained of herein and provide oversight.

F. Request immediate Follow up investigation by U.S. Department of Justice.

G. order psychological/physical evaluation and diagnosis of plaintiff at defendants expense.

H. Award plaintiff \$600,000 (six hundred thousand) in compensatory damages.

I. Request appointment of counsel.

J. Award plaintiff punitive damages, Attorney Fees and any other relief this court deems proper and, just.

Verification

I, Warren Easley hereby verifies that the foregoing statements within this complaint are true and correct to the best of my personal knowledge of belief.

6-26-23

Warren Easley KA1544
S.C.F. Rockview
Box A
1 Rockview Place
Belkfonte PA 16823




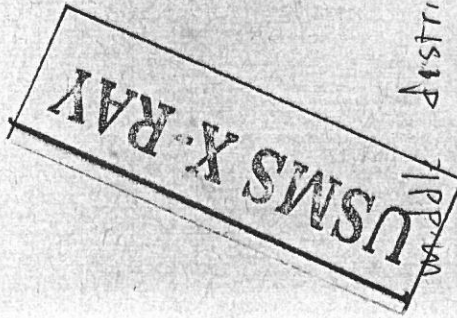
INMATE MAIL
PA DEPT OF
CORRECTIONS

Warren Easley KA 1544
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JUN 30 2023

PER  DEPUTY CLERK



Pennsylvania Middle District
United States Courthouse
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Scranton PA 18501